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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
v. :  
 : Mag. No. 19-8440  
WILLIAM TEDESCHI, :  
FAROUK LAZIZI, and :  
JUAN ROJAS HERNANDEZ :


I, Thomas R. Regina, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Thomas R. Regina, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed to telephonically  
pursuant to Local R. 4.1,

November 24, 2019 at District of New Jersey  
Date City and State

Honorable Leda Dunn Wettre  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Impersonating a Federal Officer or Employee)

On or about September 8, 2019, in Hudson County, in the District of New Jersey and elsewhere, defendant

**WILLIAM TEDESCHI**

did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is a Special Agent of the Federal Bureau of Investigation, and in such assumed and pretended character did falsely obtain money, paper, documents, and things of value.

In violation of Title 18, United States Code, Section 912.

**COUNT TWO**  
(Bank Robbery)

On or about November 5, 2019, in Hudson County, in the District of New Jersey and elsewhere, defendants

WILLIAM TEDESCHI,  
FAROUK LAZIZI, and  
JUAN ROJAS HERNANDEZ

did, knowingly, by force and violence, or by intimidation, take and attempt to take, from the person and presence of another, namely, employees of Victim Bank-1, located in Union, New Jersey, money belonging to, and in the care, custody, control, management, and possession of Victim Bank-1, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT THREE**  
(Attempted Bank Robbery)

On or about November 16, 2019, in Essex County, in the District of New Jersey and elsewhere, defendant

WILLIAM TEDESCHI

did, knowingly, by force and violence, or by intimidation take and attempt to take from the person and presence of another, namely, employees of Victim Bank-2, located in Newark, New Jersey, money belonging to, and in the care, custody, control, management, and possession of Victim Bank-2, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

**ATTACHMENT B**

I, Thomas R. Regina, a Special Agent with the Federal Bureau of Investigation ("FBI"), Newark Division, have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the dates alleged.

1. On or about September 8, 2019, WILLIAM TEDESCHI ("TEDESCHI") entered a business and introduced himself as an "FBI Agent" to the owner of the business ("Victim-1"). TEDESCHI displayed a badge bearing the words "enforcement agent" and told Victim-1 that he was collecting donations for a charity benefitting law enforcement officers (the "LEO Charity"). TEDESCHI requested that Victim-1 make a \$250 donation. After Victim-1 declined to contribute, TEDESCHI repeated that he was "the FBI." After making several pleas for a donation, Victim-1 gave TEDESCHI \$25.

2. After Victim-1 provided the \$25 donation to TEDESCHI, Victim-1 requested a receipt. TEDESCHI provided Victim-1 with a receipt from the LEO Charity. The receipt included the donation amount, the names of two purported Special Agents from the Federal Bureau of Investigation ("FBI") and the actual telephone number to the FBI's Newark Division.

3. TEDESCHI was not and has never been an employee of the United States government, the FBI, or any local, state, or federal law enforcement agency.

4. On or about November 5, 2019, at approximately 10:46 a.m., a clean shaven man with black hair, wearing glasses, a brown corduroy jacket, and a white button up shirt entered Victim Bank-1 in Union, New Jersey and retrieved a deposit slip. The man, approached a bank teller ("Victim-2") and handed Victim-2 a handwritten note on a deposit slip, which stated, in sum and substance, "Pass me all the 20's 50's and 100's this is NO Joke! OK." Victim-2 complied and gave the man (the "Robber") approximately \$10,200 in cash from the cash drawer. The Robber fled Victim Bank-1 with the money. Bank employees immediately alerted law enforcement of the robbery.

5. Video surveillance taken from the vicinity of Victim Bank-1 showed that from approximately 10:46 a.m. to 10:50 a.m., a white vehicle was parked near the corner of 44<sup>th</sup> and Bergenline, right outside of a restaurant, approximately 100 feet from Victim Bank-1. Surveillance footage also captured a person sitting in the driver's seat of the white vehicle during that time period.

Video footage further showed that at approximately 10:49 a.m., the Robber fled the robbery and entered the front passenger seat of the white vehicle and a second man ("Person-1"), wearing a red jacket and black pants entered the rear passenger side of the white vehicle. The video footage further showed that the white vehicle drove away before Person-1 closed the vehicle's door. Surveillance footage captured the white vehicle's license plate number. The investigation revealed that the license plate belonged to a 2007 white Mercury Grand Marquis (the "white Mercury"), and was being used as a taxi by taxi cab company in Jersey City, New Jersey ("Business-1"). Law enforcement further learned that the driver assigned to the white Mercury was FAROUK LAZIZI ("LAZIZI"). Further investigation revealed that the white Mercury was equipped with a global positioning system ("GPS"), which placed the white Mercury near Victim Bank-1 in or around the time of the robbery.

6. Law enforcement located LAZIZI and asked him about the robbery at Victim Bank-1. LAZIZI voluntarily provided a witness statement, denied knowing anything about a bank robbery, and stated that on November 5, 2019, a male customer named "Cherif" called LAZIZI requesting a pick up from a certain address in Jersey City. LAZIZI stated that he picked up Cherif at the address and that Cherif matched the description that law enforcement provided of the Robber. LAZIZI further advised that, at Cherif's request, he picked up a second person, a man matching the description of Person-1, from another address in Jersey City. LAZIZI positively identified "Cherif" from a photograph of the Robber captured on bank surveillance cameras during the robbery. Further investigation revealed that TEDESCHI's address was the same as the location where LAZIZI picked up Cherif.

7. On or about November 5, 2019, local law enforcement arrested TEDESCHI for the robbery. After formally waiving his *Miranda* rights, TEDESCHI admitted to law enforcement that he robbed Victim Bank-1 earlier that morning. TEDESCHI admitted that he, LAZIZI, and a man named "Juan" planned the robbery and that they agreed that LAZIZI would be the getaway driver and Juan would be the lookout. TEDESCHI also admitted the three men split the proceeds of the robbery. TEDESCHI also identified JUAN ROJAS ("ROJAS") from a photograph, and he described the clothing ROJAS wore during the robbery as consistent with the clothing worn by Person-1. TEDESCHI also advised law enforcement that ROJAS had facial tattoos, and provided law enforcement with ROJAS' address. ROJAS' address was consistent with the address location from where LAZIZI picked up Person-1. TEDESCHI further advised law enforcement that he and LAZIZI previously had used drugs together.

8. Hours later, on or about November 6, 2019, law enforcement arrested ROJAS for his role in the robbery. Law enforcement also recovered the clothes from ROJAS' home that matched the clothing worn by Person-1 during the robbery. After his arrest, ROJAS formally waived his *Miranda* rights, and he

admitted to law enforcement that he participated in the robbery of Victim Bank-1 with TEDESCHI and LAZIZI. ROJAS also admitted that he received money stolen during the robbery. ROJAS was shown photographs of TEDESCHI and LAZIZI and positively identified both TEDESCHI and LAZIZI in photographs as two other individuals involved in the robbery of Victim Bank-1 on November 5, 2019.

9. On or about that same day, law enforcement questioned LAZIZI again about the Victim Bank-1 robbery. Law enforcement showed LAZIZI photographs of TEDESCHI and ROJAS. LAZIZI positively identified TEDESCHI and ROJAS as the two customers he picked up from Jersey City-locations and drove to the area near Victim Bank-1. LAZIZI admitted, in sum and substance, that he had driven TEDESCHI on prior occasions, had been inside TEDESCHI's house, and he and TEDESCHI smoked crack cocaine together.

10. On or about November 13, 2019, TEDESCHI was released on bail.

11. Three days later, on or about November 16, 2019, at approximately 11:53 a.m., a man wearing a black leather jacket and grey gloves and holding a white plastic grocery bag with red lettering entered Victim Bank-2 in Newark, New Jersey. The man, approached a bank teller ("Victim-3") and handed Victim-3 two handwritten notes on deposit slips. One note stated, in sum and substance, "Pass me the all the 20's 50's and 100's, Very Quickly!" This is no joke." The second note stated, in sum and substance, "Pass me the all the 20's 50's and 100's This is no joke." Victim-3 activated the silent alarm and went to a back area to alert another employee of the robbery. The man (the "attempted bank robber") fled the bank.

12. Law enforcement officers investigating the attempted robbery at Victim Bank-2 compared TEDESCHI's arrest photograph with surveillance images of the attempted bank robber and determined that they were similar in appearance. Law enforcement presented Victim-3 with a photo array and Victim-3 positively identified TEDESCHI was the individual attempted bank robber.

13. At all times relevant to this criminal complaint, the deposits of Victim Bank-1 and Victim Bank-2 were insured by the Federal Deposit Insurance Corporation.